

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

APR 8 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Federal-State Joint Board on)
Universal Service)
_____)

CC Docket No. 96-45

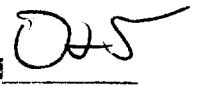
DOCKET FILE COPY ORIGINAL

INITIAL JOINT COMMENTS
ALLIED ASSOCIATED PARTNERS, LP
GELD INFORMATION SYSTEMS

Curtis T. White
Managing Partner
4201 Connecticut Ave., NW
Suite 402
Washington, DC 20008-1158
(202)537-1500 (Voice)
(202)244-1628 (Fax)
e-mail: whitec4201@aol.com

April 8, 1996

No. of Copies rec'd _____
List ABCDE



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
_____)	

INITIAL COMMENTS

Allied Associated Partners, LP and GELD Information Systems hereby file joint comments in the above-captioned proceeding. Through this filing, the parties offer comment on certain policy considerations they urge the Commission to consider as it implements the Congressionally mandated goals of the Telecommunications Act of 1996 (1996 Act), particularly the directive that evolving advanced telecommunications and information technologies be afforded to all members of the consuming public at just, reasonable and affordable rates.

Allied is comprised of principals and entities with operating experience in mobile and fixed communications services. GELD is actively involved in the deployment of advanced telecommunications technology and services. They jointly support the adoption of rules and procedures which are competitively and technologically neutral, and which do not confer an unreasonable advantage of one technology or service provider over another technology or service provider. Similarly, they endorse the establishment of procedures which ensure access by all members of the consuming public to those categories of service determined indispensable.

But using the history of telecom deployment as a guidepost, the joint parties fear certain sectors of the consuming public, especially economically distressed urban areas, are likely to face either an inequitable access to dispensable services and/or transport systems which inevitably skewer costs away from the just and reasonable standard. A brief discussion in this regard.

Advanced Technology Presumes Expanded Capacity

The 1996 Act instructs the Commission to focus on advanced telecommunications and information services which, minimally, extends beyond basic telephone services or POTS. It then stresses that the consuming public in rural, insular and high-cost areas, as well as low-income consumers, should have access to services reasonably comparable to a yet to be defined urban standard or level.

Comments on comparative benchmarks have been solicited in this proceeding, and the Commission is expected to discharge its statutory responsibility in due course and adopt rules and procedures consistent with the public interest standard. However, the seeds of unequal access are already being planted even as this regulatory proceeding goes forward.

It is generally known that broadband capacity, primarily fiber grids, are now being installed in many "major" or "high" traffic areas. And, as in the late 1970s vis-a-vis deployment of cable television, inner city areas (particularly economically distressed areas) are not regarded as sufficiently attractive for the requisite private investment.¹ As a result,

¹ *There was the unfortunate presumption (and operating guideline) during the late 1970s that cable television could not prove viable in inner city areas for a number of reasons. The myth took on a life of its own and, as a result, many other communities were wired in advance of the industry's most lucrative and loyal markets. If such myths can adversely affect market development where the sole focus is revenue streams and penetration, one can safely presume that reluctance to develop such markets in this new environment will likely prove even more difficult.*

such areas have already begun to fall behind their more affluent counterparts in their overall bandwidth capacity to handle emerging or expanded services such as telemedicine, distance learning, high-speed internet services (at centralized reduced costs), centralized energy management or sophisticated alarm services. This headstart will quickly be exacerbated because, over time, these advanced technology services will develop their independent streams of revenue. At the same time, sectors without the requisite bandwidth capacity have neither the advanced service(s) nor associated revenue stream(s).

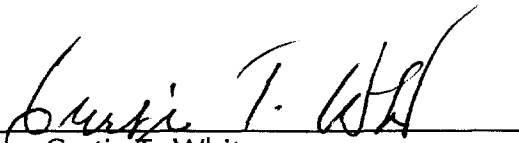
A possible solution to this early stage problem is for the Commission to specifically classify broadband capacity as a service includible under any comparative review, and to require or otherwise develop support mechanisms where access falls below the requisite comparative benchmark.

Conclusion

For the reasons stated, the parties request that the Commission adopt their foregoing joint recommendation.

Respectfully submitted,

Allied Associated Partners, LP
GELD Information Systems

By: 
Curtis T. White
Managing Partner

4201 Connecticut Ave., NW
Washington, DC 20008-1158
(202)537-1500 (Voice)
(202)244-2628 (Fax)
e-mail: whitec4201@aol.com